

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

First-Class Mail and Periodicals
Service Standard Changes, 2021

)

Docket No. N2021-1

**ASSOCIATION FOR POSTAL COMMERCE
FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO USPS WITNESS THRESS (POSTCOM/USPS-T-5-1-4)**

May 11, 2021

Pursuant to 39 C.F.R. § 3020.117, the Association for Postal Commerce (“PostCom”) submits these interrogatories and requests for production to United States Postal Service (“USPS” or “Postal Service”) witness Thomas E. Thress (USPS-T-5). If the witness cannot answer a question or subpart or provide the data requested, PostCom requests that the Postal Service answer through another witness or submit an institutional response.

Respectfully submitted,

/s/ Matthew D. Field

Matthew D. Field
Ian D. Volner
Venable LLP
600 Massachusetts Ave, N.W.
Washington, DC 20001
(202) 344-8281
mfield@venable.com
idvolner@venable.com

Counsel to Association for Postal Commerce

PostCom/USPS-T-5-1. Please refer to page 36 of USPS-T-5 and the statement, the “Postal Service estimates that the proposed changes to service standards could increase average delivery time by as much as 18 percent within the affected delivery networks.”

- a. Please identify the Postal Service source for this 18 percent estimate in increase in average delivery time.
- b. Please explain the derivation of this estimate and provide supporting workpapers and calculations.

PostCom/USPS-T-5-2. Please refer to USPS T-5 at pages 36-38 and Library Reference Library Reference LR-N2021-1-5. Please confirm that in applying the 18% increase in average days to delivery figure to determine the financial impact of the changes, Witness Thress applied the 18% against the entire volume of the particular category. For instance, please confirm that Mr. Thress’s determination that an 18% increase in average days for delivery for FCM Workshare Mail would reduce volume by 0.65%, or 240.2 million pieces of mail, which results in \$53.9 million in lost contribution, is derived by applying the 18% figure against the entire volume of FCM Workshare Mail, regardless of whether mail within that category would actually experience a change in service standards.

- a. Did Mr. Thress or the Postal Service attempt to determine the increase in average days to delivery only for the mail that will experience a change in service standards?
 - i. For instance, the Postal Service states that 61% of FCM will keep its current service standards under the proposal. Did the Postal Service provide Mr. Thress with an estimate of whether the average days to delivery for this mail would change?
 - ii. Did the Postal Service provide Mr. Thress with the anticipated change in average days to delivery that the 39% of First-Class Mail that will see a reduction in service standards will experience?
- b. Please confirm that Mr. Thress did not attempt to model the financial impact of the proposed changes on only those pieces of mail that would experience a change in service standards.

PostCom/USPS-T-5-3. Does the Postal Service expect the average days to delivery to change for mail volumes that will not experience a change in service standards under the proposal?

- a. If yes, please indicate the expected change in average days to delivery for any mail that will not experience a change in service standards and provide any supporting research, calculations, or analysis.
- b. If yes, did the Postal Service provided this information to Witness Thress? Please explain why or why not.

PostCom/USPS-T-5-4. Please refer to USPS-T-5 at page 8 and the chart “Average Days to Delivery vs. Mail Volume: First Class Workshare Mail,” and the tab “Data” in the “Thress” spreadsheet in Library Reference LR-N2021-1-5. Please confirm that the average days to delivery for First Class Workshare Mail did not exceed 2.4 days between FY 2009 Q3 and FY 2020 Q3.

- a. Please confirm that this average days to delivery figure falls within the current service standard for First Class Mail of 1-3 days.
- b. Has Witness Thress or the Postal Service determined the average days to delivery for First Class Workshare Mail currently subject to a 3-day service standard?
- c. Please refer to USPS-T-3 (Hagenstein) at page 22 and the statement that “approximately 47 percent of FCM presently subject to a three-day service standard will remain as three-day” under the proposed changes.
 - i. Please confirm that 53% of FCM presently subject to a three-day service standard will have either a four- or five-day service standard when the proposed changes are implemented.
 - ii. If the answer to Question 4.c. is confirmed, has the Postal Service estimated or projected the average days for delivery it expects this 53% of FCM to experience when the new service standards are implemented?
 1. If no, why not?
 2. If yes, please provide any supporting analysis or calculations for the estimated or projected average days to delivery.
 3. Does the Postal Service expect the average days to delivery for mail subject to a four or five day service standard under the proposed changes to be 2.4 days or less?